

Exhibit 3

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SOKOLOW, *ET AL.*,

Plaintiffs,

v.

PALESTINIAN LIBERATION ORGANIZATION, *ET AL.*,

Defendants.

04 Civ. 00397 (GBD) (RLE)

DECLARATION OF PIERRE BENICHO

Pursuant to 28 U.S.C. § 1746, I the undersigned, Pierre Benichou, Israeli I.D. No. 323522235, under penalty of perjury according to the laws of the United States and Israel, hereby declare in writing as follows:

1. My name is Pierre Benichou, although I also work under the professional name “Pierre Rehov.” I was born in Algeria in 1952 and moved to Paris, France in 1961 at the age of 9. I studied law at Assas University in Paris and have been working as a journalist since 1972. During the course of my career, I have worked in print, radio and television journalism.

2. I began producing fiction films in the 1980’s. Then, after the outbreak of the Second Intifada in 2000, based on my experience as a journalist and as a producer of fiction films, I began producing documentary films. I have produced a total of three fiction films and nine documentary films. I produced all of these films independently.

3. In the ordinary course of my work as a journalist and a documentary film maker, I have conducted interviews of close to 100 Palestinians, including more than 40 terrorists, as well as Palestinian intellectuals and professionals.

4. It is my regular practice as a journalist and documentary film producer to record these interviews at the time they take place using audio-visual recording equipment. I work with professional cameramen who do the actual filming. I am present most of the times during the filming, which is done under my complete direction and control.

5. In the ordinary course of my work as a journalist and documentary film producer, I retain in my home on tapes, labeled by the name of the film, all original, complete and unedited raw footage for each of my films, which includes my original interviews, as well as authentic copies of the final versions of each of my films. I have approximately 1,000 hours of original, complete and unedited raw footage stored in my home.

6. I personally oversee the editing process for all of my documentary films. For the sake of my professional credibility as a journalist and a documentary film producer, maintaining the accuracy of the portrayals of my interview subjects is crucial. Therefore, when editing the raw footage of my films to compile the final product, I am careful to ensure that the words and messages of my interview subjects are preserved in the original language and in any translations or subtitles.

7. During the course of my work as a documentary film producer, in 2007, I produced a documentary film titled "Suicide Killers." In producing this documentary, during 2005-2007 (but primarily in 2005 and 2006), I interviewed people involved in suicide terror attacks, including Qahira Sa'adi and Sana'a Shehadeh, both of whom were in prison having been convicted for their roles in a suicide terrorist bombing on March 21, 2002 in downtown Jerusalem.

8. In accordance with my regular practices described above, I recorded these interviews on film at the time they were conducted. Once I completed my recording, I oversaw the editing of the 100-150 hours of raw footage to create the final 87-minute film.

9. In accordance with my regular practices described above and as part of my regularly conducted business as a documentary film producer, I retained the original, complete and unedited raw footage created for the documentary film "Suicide Killers" on tapes in my home under the label "Suicide Killers."

10. A true, accurate, and authentic copy of the final version of this documentary is reproduced on the accompanying DVD as Plaintiffs' Trial Exhibit 372.

11. My name and signature appear below. I declare under penalty of perjury under the laws of the United States of America that that the foregoing is true and correct.

Dated: 20.11.2014


PIERRE BENICHOU

I affirm that on November 20, 2014, appeared before me, Avi Gubz, Attorney License Number 66824, Pierre Benichou, Israeli I.D. No. 32352235, and after I warned him that he is obligated to state the truth and that he will face penalties set by law should he fail to do so, he confirmed the truth of his declaration herein and signed before me.

Avi Gubz
Attorney

אברהם גז, עו"ד
מ.ר. 66824
Stamp